UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

DEC 21 2005

Gary Blackburn, Chief
Bureau of Environmental Remediation
Kansas Department of Health and Environment
1000 S.W. Jackson, Suite 410
Topeka, KS 662120

Site: United Zinc #1
ID # KSN000205026
Break: 5.0
Other: 12-21-05

Dear Mr. ~~Blackburn~~ Gary:

Enclosed are copies of the current Environmental Protection Agency guidance's for sampling and remediation of lead contaminated sites. These are: the Superfund Lead-Contaminated Residential Sites Handbook [OSWER #9285.7-50] (August 2003) and the OSWER Directive: Revised Interim Soil Lead Guidance for CERCLA Sites and RCRA Corrective Action Facilities [OSWER Dir #9355.4-12] (August 1994).

In using these documents for site assessment, risk assessment and cleanup decisions, particular attention should be given to Section 4 of the handbook, which recommends that samples collected from the zero to one inch depth are used for risk assessment purposes. Also, samples from six inch intervals should be collected up to at least the eighteen or twenty four inch depth. In residential areas these samples should be collected from the residential yards where children may play. This would apply to Preliminary Assessments, Site Investigations and Removal Site Evaluations.

If you have any questions or comments, please contact Paul Roemerman, Kansas Site Assessment Manager at 913-551-7694.

40249494
SUPERFUND RECORDS

Sincerely,

Kenneth S. Buchholz, Chief
Enforcement and Fund-lead Removal Branch
Superfund Division

cc: Leo Henning, KDHE w/enclosure
Rick Bean, KDHE w/enclosure

RECYCLE
PAPER CONTAINS RECYCLED FIBERS

K A N S A S

RODERICK L. BREMBY, SECRETARY

KATHLEEN SEBELIUS, GOVERNOR

DEPARTMENT OF HEALTH AND ENVIRONMENT

September 28, 2005

Cecilia Tapia
Director, Superfund Division, EPA Region VII
901 North 5th Street
Kansas City, Kansas 66101

RE: United Zinc Site, Iola, Allen County, Kansas
KDHE I.D. # C3-001-71726

Dear Ms. Tapia:

The Kansas of Department of Health and Environment (KDHE) has completed a Preliminary Removal Site Evaluation (PRE) of the United Zinc#1 site in Iola, Allen County, Kansas. The site is centered around the former United Zinc #1 smelter works. After several investigations, KDHE has identified levels of heavy metals, especially lead, but including arsenic, zinc, and cadmium, in multiple residential yards as well as a portion of the McKinley Elementary School playground. KDHE recommends that a time-critical removal action be conducted at the site consistent with § 300 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and hereby refers this site to EPA. The "Request for Federal Action" form is also enclosed. KDHE also requests the opportunity to conduct the post-removal site assessment. If you have any additional questions relative to the United Zinc site, please feel free to contact Rick Bean at (785) 296-1675.

Sincerely,

Leo G Henning for GB

Gary Blackburn
Bureau Manager
Bureau of Environmental Remediation

rlb/Attachments

c: Rick Bean -> Randy Brown -> Bridget Wilson
Paul Roemerman, EPA/EFLR
Leo Henning, KDHE

DIVISION OF ENVIRONMENT
Bureau of Environmental Remediation
CURTIS STATE OFFICE BUILDING, 1000 SW JACKSON ST., STE. 410, TOPEKA, KS 66612-1367
Voice 785-296-1673 Fax 785-296-7030 http://www.kdhe.state.ks.us/

REQUEST FOR FEDERAL ACTION

The Kansas Department of Health and Environment (KDHE) ("Requesting Agency") requests that the United States Environmental Protection Agency, Region 7 ("EPA") to conduct a response action at the facility located at:

United Zinc #1 Site, including McKinley Elementary School and multiple residential properties (see report)

Street Address, Parcel Number or Other Property Description:
Centered at Highway 54 and Kansas Drive, Iola, Kansas 66749

By making this Request, the Requesting Agency recognizes that EPA, or any other federal agency acting in conjunction with or on behalf of EPA, may use its authority under the Comprehensive Environmental Response Compensation and Liability Act ("CERCLA"), 42 U.S.C.A. §§ 9601, et seq., the National Contingency Plan ("NCP"), 40 C.F.R. Part 300, or any other federal statute, regulation or response program, to respond to and recover costs incurred in response to releases to threats of releases of pollutants and contaminants as deemed necessary in EPA's sole discretion to abate an imminent and substantial endangerment to public health or welfare or the environment at the location stated above. By making this Request, the Requesting Agency waives notice as otherwise required by Section 128(b)(1)(D) of CERCLA, 42 U.S.C. § 9628(b)(1)(D). The signatory of this request is authorized to make this request on behalf of the State.

Leo G Henning for GB
Signature

Gary Blackburn, Bureau Manager, BER
Name/Title

9-29-05
Date

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF ENVIRONMENTAL REMEDIATION
SITE EVALUATION DECISION

SITE NAME: **United Zinc #1 Site** KDHE ID #: C300171726

City: Iola County: Allen State: Kansas

Refer to Report Dated: September, 2005 Report type: **Preliminary Removal Evaluation (PRE)**

Project Manager: Randolph L. Brown L.P.G., KDHE/BER

DECISION:

[ ] 1. Further Remedial Action Recommended:
- [ ] Site referred to Enforcement/Negotiation Program
- [ ] Site referred to State Cooperative/Voluntary Program
- [ ] Site referred to UST/AST/Dry Cleaner Trust Fund
- [ ] Site referred to State Water Plan
- [ ] Other:

[X] 2. Further CERCLA Site Assessment Recommended: Priority: [X] Higher [ ] Lower
Activity Type: [ ] PA [ ] PA/SSI [X] Removal Evaluation/Removal Action

[ ] 3. Referral to Another Regulatory Program.
(Program deferred to:_____)

[ ] 4. No Further Action Recommended

DISCUSSION/RATIONALE: The site includes the former United Zinc #1 primary lead and zinc smelter and surrounding residential and non-residential properties. Sampling was conducted by a KDHE contractor in 2004 and 2005. These results indicated lead present above residential Risk-based Standards for Kansas (RSK) levels in addition to arsenic, cadmium and zinc. Multiple residential yards were determined to be impacted.

KDHE conducted this PRE in a short timeframe to further evaluate two sensitive receptor areas within the site, the McKinley Elementary School (McKinley) and the Iola Preschool. Elevated levels of lead were identified in the school yard and adjacent areas at McKinley, with the maximum detection from the limited laboratory analyses of 1,980 mg/kg within the McKinley playground area. This is above both residential (400 mg/kg) and non-residential (1,000 mg/kg) RSK levels. Elevated levels of arsenic above the residential RSK level of 11 mg/kg were identified corresponding with elevated lead detections over 400 mg/kg. The Iola Preschool did not indicate any detections at or above 400 mg/kg in the play areas and adjacent yard.

The location of elevated lead and other heavy metal detections in residential and a sensitive receptor area are qualifying conditions for referral for a time-critical removal action consistent with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). KDHE's attempts at identifying potentially responsible parties for the known operating entities at the smelter have not been successful, and KDHE has no other programmatic options at its disposal to conduct the response actions.

The PRE data indicate that a significant soil impact of heavy metals is present at the site. Further removal site evaluation and a removal action consistent with the NCP are warranted at this site. KDHE will assist with further removal evaluation at the site as resources permit, and will conduct any post-removal assessments consistent with the NCP.

Report Reviewed and Approved by: Signature: Date:

Randolph L. Brown 09/27/05
Unit Chief, Site Assessment Unit/Remedial Section/Bureau of Environmental Remediation

Site Decision Made by: Signature: Date:

Rick L. Bean 09/29/05
Section Chief, Remedial Section/Bureau of Environmental Remediation